

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA**

NANCY R., pseudonymously,)
)
Plaintiff,)
v.)
)
PLAZA HOTELS, LLC; STEVE)
KETTER; MICHAEL WILEY; OKC)
AIRPORT ES, LLC; ESH)
STRATEGIES FRANCHISE, LLC;)
KAJAL HOSPITALITY, LLC;)
JALIYAN HOSPITALITY, INC.;)
SUPER 8 WORLDWIDE, INC.; RAJ)
KRUPA HOTEL, LLC; DAYS INNS)
WORLDWIDE, INC.; CHAND &)
SAAJ HOSPITALITY, INC.;)
RAMADA WORLDWIDE, INC.;)
YASH ENTERPRISES, INC.;)
HOWARD JOHNSON)
INTERNATIONAL, INC.; NOOR)
HOTEL, LLC; AMBICA, LLC; OM,)
LLC; INDRA, LLC; AND G6)
HOSPITALITY FRANCHISING,)
LLC,)

No. 5:25-cv-00462-G

Defendants.

**STIPULATION EXTENDING THE TIME FOR ESH STRATEGIES
FRANCHISE, LLC TO ANSWER PLAINTIFF'S COMPLAINT**

Plaintiff, by and through the undersigned counsel of record, hereby stipulates that the time within which Defendant ESH Strategies Franchise, LLC has to answer, object or otherwise file responsive pleadings to Plaintiff's Original Complaint is extended up through and including May 14, 2025.

THE HANDLEY LAW CENTER

/s/ Fletcher D. Handley, Jr.
Fletcher D. Handley, Jr., OBA #3797
111 S. Rock Island Ave
Post Office Box 310
El Reno, OK 73036
Telephone: (405) 295-1924
Facsimile: (405) 262-3531
fdh@handleylaw.com

GEOFFREY C. PARKER, ESQ.
(Pro Hac Vice forthcoming)
Hilton Parker LLC
7658 Slate Ridge Boulevard
Reynoldsburg, OH 43068
Tel: (614) 992-2277
Fax: (614) 927-5980
gparker@hiltonparker.com

MICHAEL C. KANE, ESQ.
(Pro Hac Vice forthcoming)
THE702FIRM INJURY
ATTORNEYS
400 South 7th Street, Suite 400
Las Vegas, NV 89101
Tel: (702) 776-3333
Fax: (702) 505-9787
service@the702firm.com

ATTORNEYS FOR PLAINTIFF